

EXHIBIT E

From: Kathryn Stephens
Sent: Thursday, July 22, 2021 10:53 AM
To: 'Owen, Stephen M.'
Cc: John Rock; Clark, Brian D.; Bourne, Joseph C.
Subject: RE: In re Pork Antitrust Litigation, No. 18-CV-01776-JRT-HB

Steve,

Thank you for your e-mail. To be clear, my letter of July 16 was an appropriate response to your letter of June 30 which was inconsistent with the message you gave us during the June 1 meet and confer—that your primary concern was preservation of relevant and responsive data, and that you understood the cost burden imaging would place on our individual third-party clients.

We have not taken the position that all imaging and searches based on a reasonably targeted list of search terms is completely unavailable, at least for some portion of our clients. In fact, as we have acknowledged, some of our clients' devices have previously been imaged. We do contend, however, that as third parties to the underlying litigation, our clients should not have to bear the costs associated with any of these processes.

In addition, the list of proposed search terms you provided is extremely overbroad and would necessarily capture information completely unrelated to anything remotely relevant to the underlying litigation.

If you would like to discuss these issues further, please advise as to your availability to conduct a meet and confer in the next couple of weeks.

Best,
Kathy

Kathy Stephens

Senior Attorney

ROCK HUTCHINSON
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From: Owen, Stephen M. <smowen@locklaw.com>
Sent: Monday, July 19, 2021 3:23 PM
To: Kathryn Stephens <kstephens@rockhutchinson.com>
Cc: John Rock <jrock@rockhutchinson.com>; Clark, Brian D. <bdclark@locklaw.com>; Bourne, Joseph C. <jcbourne@locklaw.com>
Subject: RE: In re Pork Antitrust Litigation, No. 18-CV-01776-JRT-HB

Kathryn,

Thank you for your correspondence. We disagree with your characterization of our June 1 meet and confer and disagree that Plaintiffs would be responsible for costs associated with the subpoenas. Further, we contend that we have sufficiently explained why your clients could have information highly relevant to this litigation. In light of your correspondence, we understand you do not intend to image the devices and run search terms on the imaged devices or cloud backup of any messaging apps used by your clients, which we continue to maintain is necessary to conduct a reasonable search.

Best,
Steve

From: Kathryn Stephens <kstephens@rockhutchinson.com>
Sent: Friday, July 16, 2021 10:29 AM
To: Owen, Stephen M. <smowen@locklaw.com>
Cc: John Rock <jrock@rockhutchinson.com>; Clark, Brian D. <bdclark@locklaw.com>; Bourne, Joseph C. <jcbourne@locklaw.com>
Subject: In re Pork Antitrust Litigation, No. 18-CV-01776-JRT-HB

Mr. Owen,

Please see the attached correspondence.

Best,

Kathy Stephens

Senior Attorney

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